

**JUN 29 2006**

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**DATE:** June 29, 2006

**TO:**

<b>NAME:</b>	<b>FAX NO.:</b>	<b>PHONE NO.:</b>
Examiner James A. Thompson AU 2625 USPTO	571.273.8300	571.272.7441

**NUMBER OF PAGES (INCLUDING COVER PAGE): 3**

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**FROM:** Ross F. Hunt, Jr.

**C/M CODE:**

**TRANSMITTED BY:** Donna Lewis

**DATE:** \_\_\_\_\_ **TIME:** \_\_\_\_\_

**MESSAGE:** RE: USSN 09/761,623

Please deliver to Examiner Thompson as soon as possible.

Thank you.

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**MEMORANDUM**

Ross F. Hunt, Jr.  
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rhunt@stites.com

TO: Examiner James A. Thompson  
USPTO  
Art Group 2625

FROM: Ross F. Hunt, Jr.

DATE: June 29, 2006

RE: USSN 09/761,623  
OKADA ET AL.  
ATTORNEY DOCKET NO. 37026-88077

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**SUMMARY OF PROPOSED POINTS PER DISCUSSION AT INTERVIEW**

The main points to be discussed at the interview concern teachings of the Katayama patent and the manner in which the claims define over this reference. In this regard, it is respectfully submitted that the Examiner has misinterpreted both the claims and the Katayama reference.

For example, claim 1 requires that the second converting unit converts the image data into secondary data, i.e., the image data converted by the first converting unit, and that the dissimilarity calculating unit calculates dissimilarity between the primary data (which is defined as the data produced by the first converting unit) and the secondary data (which is defined as the data produced by the second converting unit).

The random number generator 32 of Katayama merely produces (as would be expected) a random number, which is added by adder 36 to the output M of the gradient conversion table 30 to produce the output L. Although the N-bit (N = 8) input image data is shown in Figure 5 for reference purposes, the 8-bit image data is not an input to adder 36 (the only inputs are M and K), and not part of the processing taking place at adder 36. Further, generator 32 does not calculate anything, it simply generates a number, and certainly does not calculate a dissimilarity between the primary data (which the Examiner reads as the N-bit data) and the secondary data (the M-bit data). In this regard, the "decimal part" of the M-bit data is determined by table 30. Further, to the extent that "tertiary data" is calculated, this tertiary data is clearly not the "K-bit"

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random number generation” as the Examiner contends (the K-bit number is an input) but rather the L-bit data output of adder 36. Thus, it is respectfully submitted that the Examiner is misreading Figure 5 and the description thereof at column 6, lines 3-19, which simply confirm the foregoing (see also Figure 3), and that claim 1 simply cannot be properly read on Katayama as is done in the Office Action.

As stated in my today’s voicemail, the client has requested that SPE David Moore also attend the interview so that if Mr. Moore is not available at 10:00 am on July 5, 2006, a new interview date can be set. (Confirming a later telephone conference, the Examiner will telephone on or after July 6, 2006 about the interview.)